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5  
6 UNITED STATES DISTRICT COURT  
7 EASTERN DISTRICT OF WASHINGTON

8 ELF-MAN, LLC,

9 Plaintiff,

10 v.

11 C. G. CHINQUE ALBRIGHT, et al.

12 Defendants.  
13

Case No.: 2:13-CV-00115-TOR

DECLARATION OF COUNSEL  
IN SUPPORT OF MOTION TO  
WITHDRAW AS PLAINTIFF'S  
COUNSEL OF RECORD

14 I, Maureen C. VanderMay, submit the following declaration:

15 1. I am counsel of record for Plaintiff in the above-entitled matter.

16 2. I make this declaration in support of my Motion to Withdraw as Plaintiff's  
17 Counsel of Record. My statements are true to the best of my own knowledge,  
18 except as to those matters which are therein alleged on information and belief, and  
19 as to those matters, I believe them to be true.

20 2. Issues have arisen with Plaintiff's representatives that preclude me from both  
21 continuing with representation of Plaintiff and complying with the governing rules  
22 of professional conduct. Because of their privileged and confidential nature, I am  
23 not setting forth herein in greater detail the reasons for the accompanying motion.  
24 In the event that the Court requires me to disclose this information, I request that I  
25 be permitted to provide this information under seal.

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27 DECLARATION OF COUNSEL IN SUPPORT  
OF MOTION TO WITHDRAW AS PLAINTIFF'S  
28 COUNSEL OF RECORD - Page 1

1 3. Plaintiff's representatives have been provided with notice of our intent to file  
2 the accompanying motion and have reported that they are diligently seeking  
3 replacement counsel.

4 4. In order to allow Plaintiff sufficient time to locate and retain replacement  
5 counsel, our motion asks that Plaintiff be afforded at least sixty (60) days to do so.

6 **I hereby declare that the above statement is true to the best of my**  
7 **knowledge and belief, and that I understand it is made for use as evidence in**  
8 **court and is subject to penalty for perjury.**

9 DATED: June 3, 2014

10 Respectfully submitted,

11 The VanderMay Law Firm

12 s/ Maureen C. VanderMay  
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